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A. I believe it is -- it looks like the resume that I had back then, in '82.
Q. Okay. Is it your best memory that that was prepared in or around 1982?
A. It wouldn't have been prepared in '82, no, because it mentions '82 to present, so it had to be after the fact.
Q. You were working at Raytheon when you prepared that resume?
A. I believe -- I may well have. This -- there's no real date on it. It may have been when I was trying to transfer to Raytheon in Northborough.
Q. Okay. Just -- it's not a trick question. If you look at the work history on there, Raytheon is listed, isn't it?
A. Yes, Raytheon Microwave and Power Tube.
Q. So that means you were working at Raytheon when you prepared that resume?
A. Correct.
Q. And you think you might have done it in order to get an internal transfer?
A. Transfer to Microwave Northborough, in order to try to attempt to get closer to home.

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Q. Okay. In looking at that resume, is that an accurate representation of your work history?
A. Yeah. Some of them I didn't recall until seeing the names.
Q. Now that you're looking at it, you recall working at all the places listed on your resume?
A. Yes.
Q. Are there any places that you worked for more than a year that aren't on your resume?
A. No.
Q. Okay. Any of the -- at any of the jobs listed on your resume, did they have MSDS sheets available for you?
A. Not that I'm aware of.
Q. Do you know what an MSDS sheet is now?
A. Now, I do.
Q. Okay. At any of the jobs listed on your resume, did you have any health or safety training?
A. Um, Hollingsworth Soderless Terminals, mainly to keep your fingers out of the pieces that went around. Um, other than that, Electronic Molding was just keep your hands out of the places that put the screws together.
Q. Was that on-the-job type training, or was

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that a formal training program?
A. Pretty much on-the-job. There wasn't any job that I wasn't -- that I ever went to that actually sat you down, except to teach you how to solder.
Q. Mm-hmm.
A. Other than that, no, they just walked you through it.
Q. Did you work with any hazardous materials on any of the jobs before you came to Raytheon?
A. Not to the best of my knowledge, no.
Q. Did you ever tell any of your doctors that you worked with asbestos at any time?
A. No.
Q. Do you know whether you've ever worked with asbestos?
A. To the best of my knowledge, no.
Q. Okay. I'm going to ask you about the assembly drawings. How many different drawings did you use in the course of the time that you were working at Raytheon?
A. Two drawings that I worked off of continuously.
Q. Okay, and that's when you're working on the

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bench assembling?
A. Correct.
Q. And were those drawings modified over the years that you were working there, or did they stay the same?
A. The drawings themselves remained the same. The flow sheets changed slightly.
Q. What's a flow sheet?
A. It's just a procedure like whether to mask at point -- you know, the tenth thing to do is mask and the 11th thing to do is sandblast, or -- but --
Q. Was that all posted right in your workbench area?
A. No, you got like pieces of paper like this that came with your -- your print stayed with you at your bench, because those were the two I did, and you just would flip through it verifying and checking each step.
Q. Would you do it every time you assembled any of those subparts?
A. After you do five, it's like doing dishes. You do the same thing.
Q. Okay. Were the plans themselves about the size of a piece of paper, eight by 11?

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Q. Can you recall any other projects?
A. I'd be given small pieces and asked to weld, take this little piece and weld it on to that one, just spot weld it, you know. So you would go and you might weld 25 of them, and you didn't have anything to work with; you just welded them. It could have been used for somebody else to continue it on.
Q. Was that beryllium?
A. I don't know. I didn't get anything except told exactly -- one person would show you how to do it, and then you would repeat the process for as many as there were.
Q. With the tall man and with the ARCO, was your process the same of putting it together where you would put -- do the brazing, put them in the metal, and all the -- and put in the flanges? Were they the same design except for different shapes?
A. I'm going --
Q. If you can describe?
A. If I can correct you on it --
Q. Yeah.
A. I believe it to be similar. You had various materials being put together. You aligned

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them. Some pieces -- like the bosses had to be welded on first. You know, you would clean that and then you would put the Eutectic or whatever brazing compound they needed. You would load it into a stainless steel grained fixture. This fixture would go on to brazing. A day or two later, you would get the fixture back. And another person would check for leaks or holes in the soldering or the brazing. And when it passed that person, you would get it back and it would need to be cleaned up, brushed, looked for defects on it and then it went on.
Q. And that was true with regard to both ARCO and tall man?
A. Right, just different fixtures, different sizes.
Q. In a week, what would be the average number of units you would make? Or work on; excuse me.
A. Every week was so different. It really varied depending on how difficult it was. If you had pieces that you really had to work and file to fit to get them in that specification, you would spend more time with it.
Q. But would it be, say, one one week and ten

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another week --
A. Oh, no.
Q. -- sometimes or would it be --
A. You would -- I'm going to say you could easily probably average ten ARCO's to completion every week, and by the end of the week, you would do a massive final sandblasting for shipping.
Q. Okay. How many years of that time period did you work on the ARCO project, do you think?
A. From beginning until I left to QC.
Q. Okay. And how many years did you work on the tall man?
A. Oh, that didn't come into play until maybe after a year or so after I was in the lab, when they were sure I wasn't going to screw up on it.
Q. So was tall man more complex?
A. Yes.
Q. And how many, an average, would you guess that you made of those a week when you worked on them?
A. My best, probably four or five.
Q. What would you say your average was?
A. Three.
Q. Did either of these projects incorporate

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tubing -- you know, circular tubes -- in any way?
A. No.
Q. Only one more.
A. Mm-hmm.
Q. As you sit here and you think about all the dust, the dust I've heard in the -- in the bench area and sandblasting and at home, was it similar dust? Would you recall it as being the same kind of dust?
A. Somewhat similar. I mean, what I had at home would be in my smock pockets. Back then, we wore pants with cuffs; in your cuffs of your pants, you know, and it definitely was the stuff that I was sandblasting with or sandblasting.
Q. So it was the same color in all three places?
A. Oh, yeah.
Q. And it was white?
A. Right. White.
Q. Okay. No more questions. Thank you.

REDIRECT EXAMINATION

Q. (BY MR. UBERSAX) I just have a couple, then we'll get out of here. Did either the tall man or the ARCO include helical rods?

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a civil lawsuit in Rhode Island?
A. No, I don't.
Q. Do you know what court had jurisdiction over that part of Rhode Island?
A. No, I don't.
Q. Okay. Any other claims or lawsuits other than what we've mentioned so far?
A. Not to my knowledge.
Q. Was the Workers Compensation claim that you recently resolved the only Workers Compensation claim you've ever filed?
A. Yes.
Q. And the disability claim for long term disability, is that the only long term disability claim you ever filed?
A. I believe so, yes.
Q. And in terms of SSDI benefits, you've only applied for those one time; is that right?
A. Yes.
Q. Do you remember who recommended that you treat with Dr. Walters?
A. I believe it -- to the best of my knowledge, it was Dr. Yearwood.
MR. AHERN: That's all I have. Thanks.

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MR. HONIK: Any more from anyone else?
MS. LINDEMANN: Yeah, I'm going to ask some questions. Do you want me to wait?
MR. HONIK: Go right ahead.
CROSS-EXAMINATION
Q. (BY MS. LINDEMANN) Hi, Mrs. Genereux. I'm Frances Lindemann, and I'm the lawyer for Hardric Industries. And I'm sorry to be last and having to ask you questions, but I'm really interested in the period of time from 1982 to 1990 and your work at Raytheon.
A. Mm-hmm.
Q. So if we can go back there a little bit. I understood you saying that you only worked with basically two assembly drawings, the ARCO and the tall man?
A. Right.
Q. Does that mean that you were on two projects during that eight years?
A. Those were the two main things that I had to do.
Q. And so basically, it was sort of an assembly line process where you had a particular part or component that you would put together, and

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then you'd hand it on to someone else?
A. Right. Then it would go off somewhere else.
Q. Okay. And I've read a description in -- I think it was probably in Colorado -- of you working with windows?
A. That's what they called beryllium. The ceramic was called the window, you know.
Q. Okay. And was that ARCO or tall man?
A. They were both called windows.
Q. Okay. So they were both windows?
A. Yeah, that's just the name that they used to call them.
Q. Okay. Were there different windows in the ARCO and in the tall man? I mean, the windows was the piece, the beryllium oxide piece?
A. Right.
Q. Okay. And what size were they, roughly, the ones that you worked with?
A. ARCO was a diameter rather large and thick, where the tall man was a rectangle, and it was thick, but it was rectangle and -- you know, off the top of my head, to remember exactly how big, I would say like this and probably this wide.

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Q. Okay. And when you say thick, can you show me with your fingers?
A. Well, ARCO was your thicker, so I'm going to estimate it to be approximately like this.
Q. Okay.
A. And the other one was a little thicker, because you know, it -- you had like different steps, you know?
Q. Now, the only time that you actually created dust with those beryllium oxide pieces, was that when you were sandblasting?
A. Right.
Q. And the description that you made of working on a window and putting it in copper or some other metal and brazing it --
A. Right.
Q. -- was that both tall man and ARCO?
A. Right.
Q. Do you know what they were used for ultimately?
A. No.
Q. You said that those two projects were what you worked on primarily?
A. Right.

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Q. Okay.
A. I mean, could I pinpoint where it is right now? No.
Q. Okay. Now, getting back again to your work at Raytheon, where would the parts come from? Where would you get them?
A. Clarify for me. The parts in the lab?
Q. When you were working at -- at the workbench --
A. Yes.
Q. -- how would you get your parts?
A. Some days they'd be kitted.
Q. When you say kitted, what do you mean?
A. Hypothetically, they want five units. In that five units, there is -- several boxes come to you. One has five ceramic windows, another will have five top flange, five bottom flange, so many bosses, whatever is needed to make the assembly.
Q. Do you know who put together the kits?
A. No, I don't.
Q. Was it someone at Raytheon?
A. I'm assuming it may have been. I mean, we just would get them there and you would be told that's what you do for today.

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Q. Okay. When you got the kits, were they sealed up?
A. No, they're just like clear black -- clear boxes.
Q. Okay. Little boxes with pieces of the components in them?
A. Yeah.
Q. Okay. When you didn't get what you called kits, how did you get the parts?
A. They had a cabinet and you would go to the cabinet and if it -- they would have parts there and you would see if you make up your own kit for what you needed.
Q. How were the ceramic parts stored? Were they in individual envelopes?
A. No.
Q. How were they stored?
A. Clear plastic boxes.
Q. Okay. So they were just all piled in a clear plastic box?
A. No. They were heavy, so you would only have like five to a box.
Q. Did you ever see anyone stocking the boxes?
A. No.

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Q. Do you know who was responsible for doing that?
A. No.
Q. How many shifts did they run when you were at Raytheon?
A. Three.
Q. Which shift did you work?
A. First.
Q. So that started at what time and ended at what time?
A. 7:00 to 3:30.
Q. Okay. And then there were two more shifts after you?
A. Not necessarily in the lab; in the plant.
Q. Okay. Okay. I'm sorry.
A. Okay.
Q. Just talking about the BWO lab.
A. Okay.
Q. How many shifts did they run in the BWO lab when you were working there?
A. I believe we only had the one shift that did assembly.
Q. Just the first shift?
A. Right. A lot of them work hours extra.

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Q. Did you ever run out of material for your assembly?
A. When I was done with whatever -- how many he wanted me to do.
Q. Okay. Did you ever run out of material when you went to the storage box and there wasn't enough things in there for you?
A. Yeah.
Q. So what would you do then?
A. Tell the supervisor that there wasn't enough parts.
Q. I'm sorry. Who was your supervisor?
A. I don't recall the name other than Al, but you know, you'd go to their desk and simply say I can't complete it. There's not enough top flange, bottom flange, whatever. And he would just move you to another thing to do and he'd order the parts.
Q. Okay. And would the parts arrive the same shift that you were working?
A. Sometime.
Q. Was Al ever sick and you had to go to anyone else to get parts?
A. No.

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